

I have been a licensed Amateur Radio Operator for 48 years, getting my Novice in January 1955 and earning my Amateur Extra in 1977. I became a VE in 1984. Further, I worked in electronics for 20 years and am now a Professor Emeritus, having retired from a major community college district after twenty years. I am neither an engineer nor attorney, as many of the writers of petitions and comments seem to be. Still, this background gives me good insight into the level of knowledge needed to function on technical and communications planes.

I speak only for myself, not for any amateur related organizations that I belong to; nor do they speak for me.

My opinion of RM-10782 is that it should be rejected for the following reasons. After all, the CW issue is not life or death and should wait for a reasoned decision by the FCC.

They mention only two parts of 97.1 in paragraph two. Isn't the ability to advance the art in b and c as important? And DX'ers utilize CW to a high degree in e.

In paragraph three, there is no validation of the "real negative impact".

In paragraph five, sentence one, why is the cost important? Since all three petitioners are Technicians, I feel the "more readily available" refers to the ubiquitous FM gear for 50 MHz and up. Did they consider that simply keying the PTT line would give CW, even though it is not mentioned in the manual? On the receiving end, a low power transmitter, slightly off frequency, and placed near the receiver, would provide the needed beat note. In low signal conditions, where the analog characteristics of voice lead to unintelligibility, using one of the DTMF keys just might get you through.

In sentence two, they are correct, as far as they go. But I ask how would this equipment operate when the AC power is off and the laptop just died?? CW can do more with less DC power (read battery life).

In paragraph seven, I don't understand the rationale that removing the CW requirement would increase the accessibility of the bands; they are there now.

In paragraph nine, I would note that there are no hurdles mentioned in the treaty. These hurdles are self-imposed. One of the petitioners has a doctorate in an unspecified field, so I would suspect that learning is not an issue on his part.

In their Summary, Bullet 1 requests only the removal of the CW requirement, without addressing the methodologies and ramifications, especially with respect to revising Elements 2, 3 and 4 to include CW questions. Please see comments below.

Bullet 5 is somewhat correct, but does not address cost, complexity and flexibility in making the statement.

Further, I seriously wonder about the legality and utility of the “provisional basis”. Suppose that Element 1 was eliminated by the FCC and successfully challenged in a Petition for Reconsideration? How would licensees who passed the required elements then be treated? Would they just be grandfathered(mothered) in to the existing class? Would they have to retest, since they would not meet the new requirement(s). Many other possibilities come to mind.

I would refer the reader to “Is Morse Code Dead?” by Walter Fair, W5ALT, in which his data indicate that, on HF, Morse runs a very close (if not leading on some bands) second to SSB.

Given the scenario that Element 1 is eliminated for whatever reason, then Elements 2, 3 and 4 would have to be modified to include appropriate questions on Morse operation because of it's high usage, just as SSB, FM, packet and other modes are now tested.

Consider then, the number of questions currently in each element are 35, 35 and 50, respectively. What current valid questions would have to be removed?

In this regard, I again refer the reader to the yet unnumbered petition by AE4FA and K0PU, where they critically analyze the contents of the National Conference of Volunteer Examiner Coordinators (NCVEC) pools over the years. Part 97.1 (d) mentions "...trained operators, technicians, and electronics experts." I often wonder how answering 75% of 120 known questions does an expert make??

Both the unnumbered petition and the Morse item are available several places on the Internet. If you don't have access, please ask a friend to do a search ([www.QRZ.com](http://www.QRZ.com) is a good starter) and provide you with a copy.

Therefore, I would not support this RM.

Thank you for reading and considering my view on this Rulemaking.

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